

EXHIBIT 21

Deposition of Carl Metellus

Pages: 58

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1 A. Yes.

2 Q. All right. So then you put that
3 notification in the OMS system; is that correct?

4 A. Correct.

5 Q. All right. Then you say in this
6 e-mail, could you notify the module of the capital
7 R capital W. What does that mean?

8 A. That means to notify the module
9 officers of the regular watch.

10 Q. Okay. Is regular watch the same way of
11 saying Level 3?

12 A. Yes.

13 Q. All right. Meaning a 30-minute watch
14 by the officers; is that correct?

15 A. 30-minute watch by the officers,
16 15-minute watch by the offender, the watcher.

17 Q. That's the inmate monitor; is that
18 correct?

19 A. Yes.

20 Q. And we'll come back to that in a
21 minute.

22 The e-mail, by the way, I neglected to
23 ask you at the beginning, was sent to Breanne
24 Morrow. And that is -- she is the 4:00 to 12:00
25 case manager?